

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

ELISABETH KIMMEL,

Defendant.

Case No. 1:19-cr-10080-NMG-13

**ELISABETH KIMMEL'S ASSENTED-TO MOTION FOR LEAVE TO FILE
SENTENCING MEMORANDUM PARTIALLY UNDER SEAL**

Defendant Elisabeth Kimmel, by and through undersigned counsel, hereby moves this Court for leave to file her sentencing memorandum and accompanying exhibits partially under seal. As grounds and reasons therefor, counsel for Mrs. Kimmel states that Mrs. Kimmel's sentencing is scheduled for December 9, 2021, and her memorandum in advance of sentencing is due December 3, 2021. Certain portions of the memorandum and accompanying exhibits require redaction because they refer to the confidential health information of Mrs. Kimmel, her family members, and her friends. Mrs. Kimmel intends to file a redacted copy of her sentencing memorandum and accompanying exhibits in the public record and deliver a full copy of the materials to the government and to the Court for filing under seal.

WHEREFORE, Mrs. Kimmel respectfully requests that the Court allow her leave to file her sentencing memorandum and accompanying exhibits partially under seal.

Respectfully submitted,

/s/ Eóin P. Beirne

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Counsel for Elisabeth Kimmel

Dated: December 1, 2021

RULE 7.1 CERTIFICATION

Undersigned counsel certifies that, on November 30, 2021, counsel for Mrs. Kimmel conferred with counsel for the government. The government assents to her request to file certain information under seal.

CERTIFICATE OF SERVICE

I, Eóin P. Beirne, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 1, 2021.

/s/ Eóin P. Beirne

Eóin P. Beirne